Bennett, Giuliano, McDonnell & Perrone, LLP Attorneys for Defendant Fernando Torres-Negrón 225 West 34th Street, Suite 402 New York, New York 10122 Telephone: (646) 328-0120 Fax: (646) 328-0121

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

William R. Bennett, III (WB 1383)

FELIPE ROBLES VÁSQUEZ p/k/a RALDY VÁSQUEZ and CAMPESINO MUSIC ENTERTAINMENT GROUP, INC.,

NOTICE OF MOTION

NO. 06 CV 0619 (Mc Mahon)

-against-

FERNANDO TORRES NEGRÓN,

Defendants -----X

Plaintiffs,

PLEASE TAKE NOTICE, that upon the Memorandum of Law and Declaration of William R. Bennett, III accompanying this Notice, together with all the exhibits attached thereto, as well as all of the prior pleadings and papers filed herein, a motion pursuant to 28 U.S.C. §1404 to change the venue of this matter to the United States District Court for the District of Puerto Rico will be made before the Honorable Colleen McManon, United States District Court Judge, Southern District of New York.

Dated: New York, New York June 20, 2006

Yours, etc.,

/S/

William R. Bennett, III Bennett, Giuliano, McDonnell & Perrone, LLP 225 West 34th Street, Suite 402 New York, New York 10122 Telephone: (646) 328-0120 TO: James Sheinbaum, Esq. Attorneys for Plaintiff 420 Lexington Avenue Suite 2920 New York, New York 10170 (212) 687-1600 – Telephone (212) 687-8710 – Facsimile